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VIA ECF

Judge Joseph A. Marutollo, U.S.M.J.
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Laduca et al v. Bari Home Care, LLC et al*, Docket No. 24-cv-07970 (LDH)(JAM)

Dear Judge Marutollo,

This firm is counsel to Plaintiffs in the above-referenced action. Together with defense counsel, we submit this joint status report pursuant to this Court's July 16, 2025 Order.

On June 12, 2025, this Court So-Ordered the Amended Stipulation for Collective Action Certification. The deadline for individuals to join the collective is September 2, 2025.

The parties have been engaged in pre-class certification discovery. To that end, the parties have exchanged pre-class certification discovery demands and are working on their responses. The parties expect to complete pre-class certification discovery on or before October 31, 2025. Plaintiffs anticipate seeking a conference with the Court and/or the Court's permission to file a motion for class certification within three weeks of the close of pre-class certification discovery, i.e., on or before November 21, 2025.

We respectfully ask that the Court approve the foregoing proposed discovery plan. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Paige I. Piazza, Esq.

Cc: All counsel of record (via ECF)